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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215251
Party	Plaintiff Hi Media SA
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Submission	Motion for Sanctions
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Date	01/20/2015
Attachments	P1386_motion for sanctions_150113.pdf(10799 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

<p>HI MEDIA SA,</p> <p>Opposer,</p> <p>v.</p> <p>iPAY INTERNATIONAL SA,</p> <p>Applicant.</p>	<p>Opposition No.: 91215251 (Parent)</p> <p>Serial No.: 85/781,396</p> <p>Mark: IPAYTAG</p> <p>Opposition No.: 91215253</p> <p>Serial No.: 85/781,428</p> <p>Mark: IPAYWALLET</p> <p>Opposition No.: 91215254</p> <p>Serial No.: 85/781,458</p> <p>Mark: BUY WITH IPAYWALLET</p>
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OPPOSER'S MOTION FOR SANCTIONS

On December 4, 2014 the Board issued an Order compelling Applicant to respond to Opposer's discovery requests within 30 days.¹ The Board's Order warned Applicant that "[i]n the event applicant fails to serve full responses as ordered herein, opposer's remedy may lie in a motion for sanctions." Doc. No. 10 (citing 37 CFR § 2.120(g)(1); TBMP § 411.05).

To date, Applicant has not served any responses to Opposer's discovery requests, nor has Applicant's counsel further responded to Opposer's counsel's written communications on this matter.

Accordingly, pursuant to 37 C.F.R. § 2.120(g), Opposer respectfully requests that the Board sanction Applicant by sustaining these consolidated Oppositions and entering Judgment in favor of Opposer and against the Applicant.

¹ Specifically, the Order compelled Applicant to respond, without objections, to Interrogatory Nos. 1-22 and Document Request Nos. 1-39 and 41-44.

Respectfully submitted,

/Jeffrey A. Lindenbaum/
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Dated: January 20, 2015

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CERTIFICATE OF FILING AND SERVICE

I, Jeffrey A. Lindenbaum, hereby certify that I caused a true and correct copy of Opposer's Motion for Sanctions to be filed electronically with the Trademark Trial and Appeal Board, and to be served upon the following counsel of record, via first class mail, postage prepaid this 20th Day of January, 2015:

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/Jeffrey A. Lindenbaum/